

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

John S. Thompson,) C.A. No: 4:25cv1277 JD
)
 Plaintiff,)
)
 v.) DEFENDANTS OUTBACK
) STEAKHOUSE AND BLOOMIN BRANDS,
 Outback Steakhouse and Bloomin Brands,) INC.'S RESPONSES TO
 Inc.,) LOCAL RULE (D.S.C.) 26.01
) INTERROGATORIES
 Defendants.)
)

Outback Steakhouse of Florida, LLC improperly identified as Outback Steakhouse, and Bloomin Brands, Inc. ("Defendants"), submit its responses to Local Rule (D.S.C.) 26.01 Interrogatories as follows:

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of such interest.

RESPONSE: None known to Defendants at this time.

- (B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: Plaintiff has demanded a jury trial regarding her claims asserted against Defendants. Defendants additionally seeks a trial by jury.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify:

- (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate;
- (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and
- (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Outback Steakhouse of Florida, LLC is not a publicly held company. Outback Steakhouse of Florida, LLC is a wholly owned subsidiary of

OSI Restaurant Partners, LLC. OSI Restaurant Partners, LLC is a wholly owned subsidiary of OSI HoldCo, Inc. OSI HoldCo, Inc. is a wholly owned subsidiary of OSI HoldCo I, Inc. OSI HoldCo I, Inc. is a wholly owned subsidiary of OSI HoldCo II, Inc. OSI HoldCo II, Inc. is a wholly owned subsidiary of Bloomin' Brands, Inc.

Bloomin' Brands, Inc. is a publicly traded company and is traded on the New York Stock Exchange.

There is no publicly held corporation owning 10% or more of stock in Bloomin' Brands, Inc.

(D) State the basis for asserting the claim in the division in which it was filed.

RESPONSE: Venue is appropriate in this Division because the incident giving rise to the Complaint occurred in Myrtle Beach, South Carolina in Horry County.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide:

- 1) a short caption and the full case number of the related action;
- 2) an explanation of how the matters are related; and
- 3) a statement of the status of the related action.

Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: None known to Defendants.

(F) [Defendants only.] If a defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Outback Steakhouse is not properly identified and should be identified as Outback Steakhouse of Florida, LLC. Defendants would further aver that Bloomin Brands is not a proper party to this action.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Defendants' investigation into the matter of liability on the part of another person or legal entity is continuing. Defendants therefore reserves the right to amend this response upon completion of their investigation.

(H) Parties or Intervenors in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

RESPONSE: Defendants are both companies existing under the laws of the State of Florida and with a principal place of business in Florida.

Respectfully submitted,
COLLINS & LACY, P.C.

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ATTORNEYS FOR DEFENDANTS
OUTBACK STEAKHOUSE AND
BLOOMIN BRANDS, INC.

**DEFENDANTS OUTBACK
STEAKHOUSE AND BLOOMIN
BRANDS, INC.'S RESPONSES TO
LOCAL RULE (D.S.C.) 26.01
INTERROGATORIES**

Columbia, South Carolina
March 3, 2025